

# Principles of Cultural Heritage Impact Assessment In The UK

April 2021



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# Foreword

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Cultural heritage practitioners in the UK have, for some time, recognised the need for an authoritative set of principles that would promote good practice in cultural heritage impact assessment. We therefore welcome the publication of this first edition of the Principles for Cultural Heritage Impact Assessment.

Our cultural heritage, both tangible and intangible, is all-pervasive and is encountered in a wide variety of proposals that bring about change. Assessment of the impact of a proposal on cultural heritage assets will always have to be tailored to meet the requirements of a specific project. However, as this document shows, there are principles and good practice that can be applied widely across the sector. We anticipate that the application of these principles and good practice will enable practitioners to improve the standard of their assessments, regardless of their particular specialism within the discipline.

The framework within which impact assessment is undertaken is constantly evolving, as are the tools and techniques for undertaking, reporting and applying the findings of the assessment. We commit our three Institutes to periodically undertake reviews of the Principles of Cultural Heritage Impact Assessment and update it in consultation with cultural heritage professionals to ensure that the information presented remains a respected, relevant and valuable reference.

Signed

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# Acknowledgements

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# 1. Preamble

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## Cultural heritage and why it matters

*'Cultural heritage is the legacy of physical artefacts and intangible attributes of a group or society that are inherited from past generations, maintained in the present and bestowed for the benefit of future generations.'* (UNESCO)

- 1.1** Cultural heritage can include buildings and structures, monuments, parks and gardens, battlefields, townscapes, landscapes, seascapes archaeological sites, myths, festivals and traditions, whether intangible, visible, buried or submerged. Some cultural heritage is as old as our earliest ancestors, but it can also reflect our more recent past.
- 1.2** Cultural heritage connects people with place and includes the associations that can be seen, felt and heard. It is a source of memories and associations, and an inspiration for learning and creativity. Cultural heritage contributes to individual, community and national identity as well as our well-being and economic prosperity.
- 1.3** Our valued cultural heritage is a resource worthy of protection. This is recognised in government policy and legislation that seeks to safeguard and maintain the most important cultural heritage assets. Safeguarding the cultural significance of places and objects need not prevent change.

## Cultural Heritage Impact Assessment

- 1.4** Cultural Heritage Impact Assessment ('CHIA') is concerned with understanding the consequences of change to cultural significance. At a fundamental level, CHIA is used to make informed decisions about the sustainable management of cultural heritage assets.
- 1.5** The need for CHIA is triggered whenever somebody proposes to do something which could result in change to a cultural heritage asset or assets. This might be a plan, a policy or a project (collectively referred to here as 'proposal').
- 1.6** This change could be at any scale, from the smallest intervention into the fabric of a historic building, to a policy for creating new towns. This need might occur under any of the planning, consenting or legislative regimes in the UK, or in an international context.

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## This document

**1.7** This document provides guidance for cultural heritage practitioners in regard to the principles of CHIA. These are:

- A. understanding cultural heritage assets; and
- B. evaluating the consequences of change.

**1.8** Understanding cultural heritage assets distinguishes between describing the asset (what it is and what is known about it); ascribing cultural significance (a description of what is valued about it); and attributing importance (a scaled measure of the degree to which the cultural significance of that asset should be protected).

**1.9** Evaluating the consequences of change also distinguishes between three separate analytical stages: understanding change (a factual statement of how a proposal would change a cultural heritage asset or its setting, including how it is experienced); assessing impact (a scaled measure of the degree to which any change would impact on cultural significance) and weighting the effect (the measure that brings together the magnitude of the impact and the cultural heritage asset's importance).

**1.10** This document sets out a language and framework for understanding and assessing the effects of a proposal on cultural significance. This document does not seek to offer prescriptive methodological guidance on CHIA. Given the breadth of what can be regarded as cultural heritage assets and the diversity of potential change that could come about from a range of different proposals, there is no 'one size fits all' methodology to CHIA. No glossary of terms is offered either; the array of often subtly different terminology adopted across the UK, much of it already embedded in policy and guidance, would not allow for a concise or useful lexicon.

**1.11** It is expected that the principles of CHIA set out in this document will be adopted by all relevant stakeholders. Furthermore, it is anticipated that new policies, plans and projects will be drafted with an understanding of these principles at their core.

**1.12** The document also offers supporting direction ('good practice') on achieving the best outcomes for a proposal. The good practice set out below is not unique to CHIAs and could apply to any environmental or social topic matter.

# 2. The Principles of Cultural Heritage Impact Assessment

## A. UNDERSTANDING CULTURAL HERITAGE ASSETS

### Introduction

**A.1** The basis for any CHIA is an understanding of the cultural heritage assets that might be affected by a proposal. Policy and guidance throughout the UK currently emphasise the need to understand the cultural significance of a cultural heritage asset. This emphasis reflects the fact that the primary purpose of policy is to preserve cultural significance (rather than the asset and its setting per se). CHIA therefore needs to predict impacts on cultural significance and the starting point for this is an understanding of the cultural significance of each affected asset.

**A.2** The process of gaining this understanding is split into three stages:

- **Description:** Research and investigations leading to a factual statement that establishes the nature of the asset.
- **Cultural significance:** Analysis of what is valued about the asset, leading to a statement of cultural significance.
- **Importance:** A conclusion regarding the level of protection that the asset merits in planning policy and cultural heritage legislation.

**A.3** All three stages are necessary and clarity regarding the purpose of each stage will greatly assist in the process of understanding cultural heritage assets. Whilst the sequence of these three stages is important, an understanding of the cultural heritage asset is likely to be an iterative process which regularly reappraises the consequential impact on cultural significance as a proposal evolves or as more evidence emerges from research and investigations.

### Describing the asset

**A.4** It is self-evident that an understanding of cultural significance should be based on a description of the asset. However, there are two advantages in treating the description as a distinct initial stage in the process of understanding cultural heritage assets.

**A.5** Firstly, preparation of a description encourages the practitioner to collate existing information about the asset and, where this proves inadequate, consider the need to acquire additional information. For example, an asset may have only been recorded as a submerged wreck site on the seabed, leaving the survival and condition of the asset poorly defined. Alternatively, the surviving extent of original fabric in a heavily modified historic building may be poorly understood. Additional information will be gained in various ways including desk-based research and field investigations. Published guidance documents should direct and inform the undertaking of this research and investigations.

**A.6** The need to acquire additional information will depend on the nature of the proposal that is the subject of the CHIA. As described below, proportionality is key to the process; therefore, only information that is relevant to understanding how cultural significance might be affected by the proposal need be gathered.

**A.7** The second advantage in recognising a separate description stage is that it should ensure that the analysis of cultural significance, which follows, actually articulates the key cultural heritage values that are recognised in the asset and is not simply a description of all of the components of that asset.

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**A.8** The product of this stage in the understanding of a cultural heritage asset could vary from a single paragraph of text supported by a simple location plan, up to extended and detailed descriptions with complex illustrations and appendices of supporting documentation. Again, the issue is proportionality and a collaborative approach to the CHIA (in this instance engaging the decision-maker and relevant consultees in agreeing the scope) will lead to more successful outcomes.

### Ascribing cultural significance

**A.9** Cultural significance is the sum of the values that we, as a society, recognise in a cultural heritage asset and thus seek to protect or enhance for future generations. As noted above, understanding cultural significance should not be confused with a description of the cultural heritage asset which, however detailed, does not articulate what is valued about it.

**A.10** Cultural significance does not have a scale associated with it and it is therefore not appropriate to refer to 'low' or 'high' cultural significance for example. This scaling is addressed through the separate consideration of the cultural heritage asset's importance (see below). Cultural significance is not directly related to designation status nor is it defined in law, although the reasons for designation may articulate aspects of cultural significance. See below for further discussion on this matter and the way in which importance and designation are related.

**A.11** There are differences in the vocabulary used in current policy and guidance that refer to the concept of cultural significance. However, at the root of them all is a common emphasis on the need to understand cultural significance before preparing a detailed proposal for change. The logic behind this position is clear: an understanding of what is valued about a cultural heritage asset can be used to inform the design of any proposal that might affect it. This should lead to the minimising of any adverse impacts on cultural significance and the identification of any opportunities for enhancement.

**A.12** Current UK guidance recommends that cultural significance is treated as an inclusive concept covering a wide variety of values. A variety of guidance documents offer different classifications that express the breadth of these values. These include but are not limited to aesthetic, historic, scientific, social or spiritual values. In some cases, it can be difficult to assign values to particular categories within these classifications; however, they should not be treated as rigid frameworks and their primary purpose is to encourage the recognition of all values attaching to a cultural heritage asset.

**A.13** Although cultural significance will be embodied in the physical components of a cultural heritage asset, it may also be derived from remote and less tangible characteristics. These could comprise, but are not limited to: former or current use, associations, meanings, records, related places and the character, appearance and historical development of its setting, together with related objects within its setting. A critical element of understanding cultural significance relates to how the cultural heritage asset is experienced.



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**A.14** There may be a need to recognise that organisations, groups of people or individuals can assign different values to the same cultural heritage asset; this is particularly relevant with aesthetic and spiritual values. They may also be contradictory in terms of agreeing what constitutes an appropriate outcome for the cultural heritage asset. In some cases, different values may present a conflict regarding potential beneficial outcomes; such as when retaining a building's original use threatens the condition or survival of the fabric. For assets where these issues arise, it will be necessary to consult more widely with interested parties to ensure that the values are fully captured and understood.

**A.15** Analysis of cultural significance should lead to a written statement that defines the values attached to a cultural heritage asset. The length of the statement will be guided by the complexity of the values that need to be explained but clarity of meaning is more likely to be achieved from a brief and well-structured presentation.

### Attributing importance

**A.16** The importance of a cultural heritage asset is a measure of the degree to which cultural significance of that asset is sought to be protected through, for example, legislation and planning policy. Determining the importance of a cultural heritage asset is a key component in the CHIA process as it will influence the way in which decisions are made during the development of a proposal as well as the weight to be given it by the decision-maker.

**A.17** Importance is scaled (unlike cultural significance) and requires the competent practitioner to make a judgement regarding the merits of different cultural heritage assets. It is therefore appropriate to refer to 'high', 'medium' or 'low' importance or any other simple scale that offers a form of gradation.

**A.18** It is critical to recognise that not all of the component parts of the cultural heritage asset will be worthy of attributing importance. It is perfectly sensible to state that an asset is of 'high importance' followed by a qualification referring to the specific component elements that possess cultural significance. For instance, the special architectural or historic interest of a Listed Building will often form the main part of, but not necessarily all, of its overall cultural significance.

**A.19** Designation of a cultural heritage asset is one obvious way in which importance is recognised; more often designation is the acknowledgement that the cultural heritage asset is of the highest importance. However, many cultural heritage assets that are likely to be affected by a proposal will not be designated. Therefore, it will be up to the practitioner to make an informed judgement on the level of importance to be ascribed. Where possible, the importance should be articulated within a single sentence or two.

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## B. EVALUATING THE CONSEQUENCES OF CHANGE

### Introduction

- B.1** Evaluating the consequences of change is critical to the impact assessment and subsequent decision-making with regard to a proposal. Indeed, it is central to the proper protection of our cultural heritage. Having understood cultural significance, the next step is to understand the proposed change(s) and the impact they would have on cultural significance.
- B.2** The consequences of change in this context have to be assessed on a case-by-case basis as very few cultural heritage assets are the same as each other. It is not something that can be determined by a formula but instead requires understanding of the cultural significance of each cultural heritage asset. Differing cultural significance could lead to the same proposed change having a negligible adverse impact on a particular cultural heritage asset but a large adverse impact on another.
- B.3** The process of evaluating the consequences of change falls into three stages:
- Understanding change: A factual statement of how a proposal would change a cultural heritage asset or its setting (including how it is experienced).
  - Assessing impact: An assessment of the degree to which any change would impact cultural significance.
  - Weighting the effect: A conclusion regarding whether an impact matters, reflecting the importance of the affected cultural heritage asset.

### Understanding change

- B.4** Change is both the act and the result of making something different from how it was before, whether directly or indirectly, temporarily or permanently, reversibly or irreversibly. In the context of a CHIA, change to a cultural heritage asset or its setting should be explained in a factual description of all aspects of the proposal(s) including physical change to the fabric, visual appearance, use and duration. Change may or may not lead to an impact to cultural significance.
- B.5** The practitioner will need to consider whether there might be consequential change that has come about as a result of, for instance, attempts to mitigate other environmental impacts.
- B.6** Much like the description of the cultural heritage asset itself, the description of the change may be a concise affair or may require greater detail for a larger, more complex proposal.

### Assessing impact

- B.7** An impact is a change in a cultural heritage asset or the experience of an asset in its setting that affects its cultural significance. This impact could be a positive or negative outcome. It is not a measure of the reach or extent of the proposal. Therefore, it is essential that the CHIA presents an understanding of how the proposed change relates to cultural significance and not the cultural heritage asset in its entirety.

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**B.8** At its most obvious, adverse impact on cultural significance can come from total or partial loss of a cultural heritage asset through alteration or destruction. Also, it can be the result of change within the setting of a cultural heritage asset that prevents an aspect of cultural significance from being experienced, impact on the character and appearance of the setting, or the alteration of soil chemistry such that important buried archaeological remains deteriorate. Equally, change within a setting can have a beneficial impact.

**B.9** The magnitude of the impact on cultural significance needs to be assessed. A distinction needs to be drawn as to whether the change will result in only a 'small' impact on, say, just one component of cultural significance or whether the change would have a greater impact on the totality of cultural significance. The terms 'large', 'medium' or 'small' are acceptable or any other simple scale that offers a form of gradation easily articulated in a written report.

### Weighting the effect

**B.10** The effect is the measure that brings together the magnitude of the impact and the cultural heritage asset's importance. This is a critical stage of the assessment process as this determines the weight that should be given to the matter in either influencing the design of the proposal or, ultimately, in the test as to whether the proposal will be acceptable and permitted.

**B.11** Although this is a critical stage of the process, it is not an overly complex undertaking. The previous stages of the assessment will have drawn out the narrative regarding the importance of a cultural heritage asset, its cultural significance, and how the proposal will impact upon this. Therefore, this final stage could be reported within a few concise sentences.

**B.12** In relative terms, impacts on the cultural significance of assets of higher importance will be given greater weight than those of lower importance. For instance, a proposal that results in the total loss (i.e. the largest magnitude of adverse impact) of a cultural heritage asset of low importance would be an effect that should be given considerably less weight by the decision-maker than the total loss of an asset of high importance.

**B.13** A simple graded scale of effects should be defined and applied (as recommended for impact magnitude, above). However, decisions regarding the acceptability of a proposal will often require the effect to also be articulated within the parameters of the relevant legislative or policy tests that use their own specific language and terminology. For instance, in Environmental Impact Assessment ('EIA') an impact can result in significant or non-significant effects.

# 3. Good Practice

## Competent practitioners

- 3.1** CHIA should be fit-for-purpose and should be an informed and impartial assessment based upon specialist knowledge and relevant competence. One individual may not have the required expertise in all aspects of CHIA. A complex proposal that could bring about change to a variety of different cultural heritage assets may require a team with a range of skills. Also, given the role of CHIA throughout a proposal's lifecycle, the competencies required, and therefore the practitioners involved, may shift as the proposal evolves.
- 3.2** A practitioner carrying out a CHIA needs to be confident they can:
- understand the legislative, consenting, policy and planning context within which the proposal is to be assessed and implemented;
  - understand the cultural heritage asset, its setting, cultural significance and importance;
  - understand the proposal for change and the way in which these could impact cultural significance; and
  - identify if there are alternative ways of achieving the objectives of the proposal that could avoid or minimise adverse impacts.
- 3.3** Therefore, because of the potential complexity of CHIA, it is recommended that those commissioning or specifying such work ensure it is undertaken by a professionally accredited practitioner or practitioners. Those charged with appointing practitioners can consult professional bodies and organisations for advice. Individuals accredited by professional bodies have been through a rigorous peer-review assessment to ascertain their professional and ethical competence. Accredited individuals will have made a commitment to abide by the relevant professional institute's code of conduct; to follow relevant

standards and guidance documents; they commit to working within their professional competence; and they maintain expertise through Continuing Professional Development.

## Undertaking a proportionate assessment and communicating the results

- 3.4** The CHIA process should be proportionate to the importance of the cultural heritage assets being assessed. It should recognise the scale of the proposal and the potential magnitude of the impact.
- 3.5** The output of the CHIA needs to satisfy the decision-maker that the relevant cultural heritage assets have been adequately and robustly assessed.
- 3.6** Therefore, at a minimum, the scope of the CHIA should be agreed with the decision-maker at the outset of the work. In most circumstances, there will be value in consulting with cultural heritage stakeholders and advisors at local planning authorities, national heritage agencies, specialist interest groups and members of the public. Added value often comes from engaging with these stakeholders throughout the CHIA process.
- 3.7** The results of the CHIA should be clearly presented and focused for the target audience, the decision-maker. However, it is important that the language used does not make the subject inaccessible to all but specialists.
- 3.8** There is no prescribed format for the output of CHIA; however, the three stages within each of the two principles (above) provide a framework for a written report. This should be tailored to meet any requirements of the consenting regime (geographical and legislative) to which the proposal applies.

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## Informing design and the iterative process

**3.9** CHIA plays a key role in influencing the degree to which a proposal conserves and enhances cultural heritage assets and improves the outcomes of the proposal. Therefore, the best outcome will come from engaging a competent practitioner early in the development of the proposal.

**3.10** The benefit of the iterative nature of the CHIA process is established in the principles above. However, in summary, the understanding of cultural significance will directly feed into the development of the proposal so that the effect can be recognised and, if necessary, the proposal modified to avoid or minimise adverse effects and, if possible, enhance the cultural significance or the way in which it is experienced.

**3.11** A potential outcome of the CHIA process is that a proposal is halted or withdrawn if the effect is judged to be unlikely to be acceptable. However, more often though, the process will positively influence the final proposal so that the consequences of change have the least possible adverse impact and the maximum possible public benefit.

# 4. Summary

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**4.1** This document sets out the Principles of Cultural Heritage Impact Assessment (CHIA) and some good practice to support this.

**4.2** CHIA is concerned with understanding the consequences of change to cultural significance. At a fundamental level, CHIA is used to make informed decisions about the sustainable management of cultural heritage assets.

**4.3** The two principles of CHIA and the six analytical stages from which they are formed are:

**A.** Understanding cultural heritage assets:

1. describing the asset;
2. ascribing cultural significance; and
3. attributing importance.

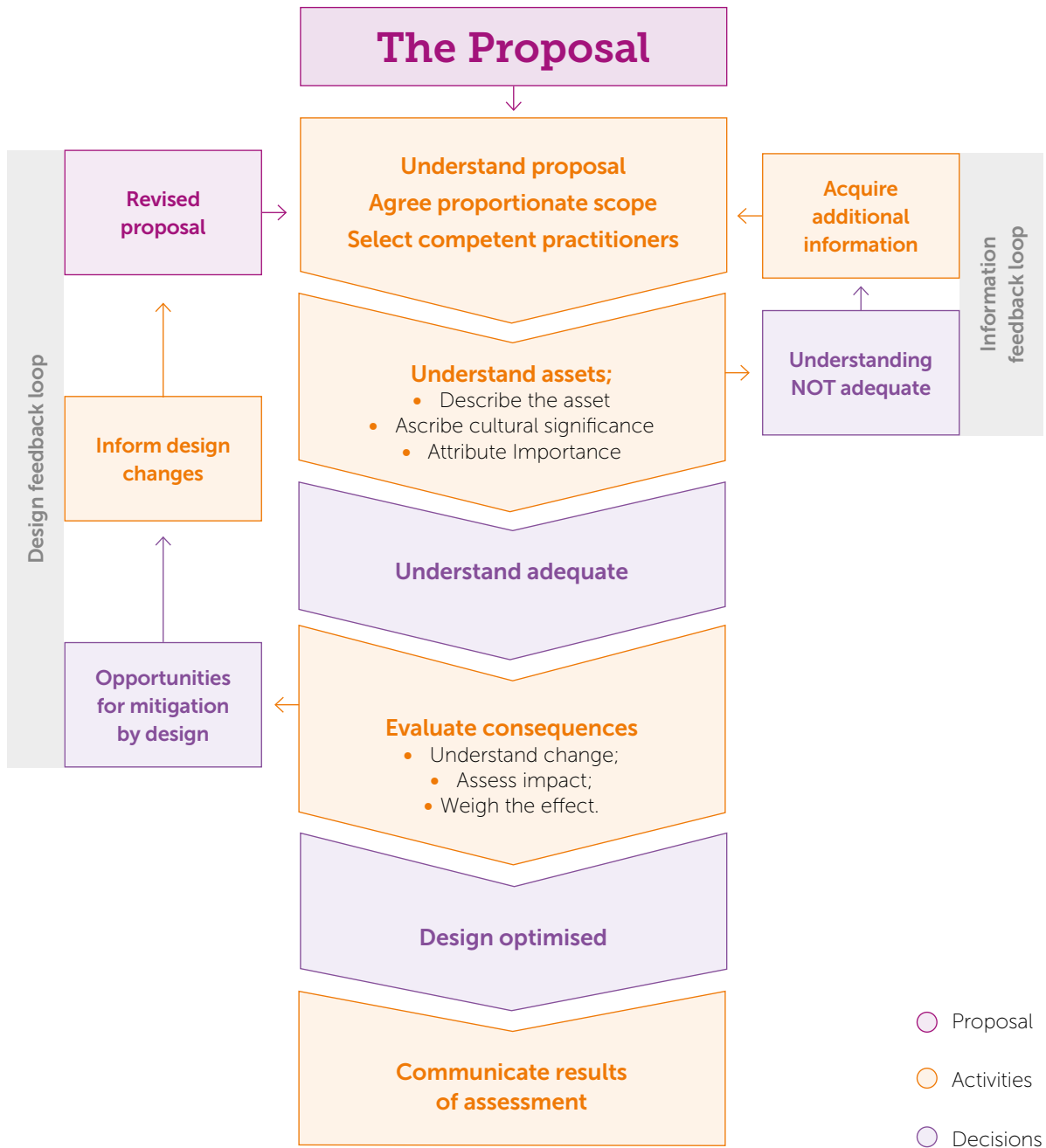
**B.** Evaluating the consequences of change:

1. understanding change;
2. assessing impact; and
3. weighting the effect.

**4.4** This document does not seek to offer prescriptive methodological guidance on CHIA. However, this document sets out a new language and framework for all practitioners to adopt when assessing the effects of a proposal on cultural significance.

**4.5** The good practice is directed towards the need for a competent individual or team of competent practitioners to undertake the CHIA; the need for a proportionate and effectively communicated CHIA; and the value of CHIA in informing design.

**4.6** The diagram that follows here brings together the principles and good practice into a recognisable work flow common to CHIA.



## About IEMA

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